

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

AMERICAN AIRLINES, INC.,

Plaintiff,

v.

THE CITY OF CHICAGO and MICHAEL P.
MCMURRAY, in his capacity as the
Commissioner of the Chicago Department of
Aviation,

Defendants.

Case No. 1:25-cv-04874

Hon. Judge Joan H. Lefkow

MOTION FOR PRELIMINARY INJUNCTION

Plaintiff American Airlines, Inc. (“American”), by its attorney Latham & Watkins LLP, respectfully moves this Court, pursuant to Rule 65(a) of the Federal Rules of Civil Procedure, for a preliminary injunction against the City of Chicago and Michael P. McMurray, Commissioner of the Chicago Department of Aviation (together, the “Defendants”).

For the reasons fully stated in the Memorandum in Support of this Motion (the “Memorandum”), American will be immediately and irreparably harmed unless this Court grants a preliminary injunction directing Defendants to halt the redetermination of gate space at Chicago’s O’Hare International Airport (“O’Hare”) that is set to take effect October 1, 2025 (the “Gate Redetermination”), and prohibit the initiation of the next redetermination of gate space at O’Hare until at least April 1, 2027. The Gate Redetermination plainly violates the provisions governing the reallocation and assignment of gate space at O’Hare set forth in the Airline Use and Lease Agreement entered into between the City of Chicago and American (the “AULA”). Without immediate judicial intervention, American will suffer irreparable harm from the Gate

Redetermination, which will reduce American's gate share at O'Hare. Such reduction will undermine American's competitive position, erode customer goodwill, disrupt its operational efficiency, and necessitate significant changes to its business model.

WHEREFORE, American respectfully requests the Court issue an Order granting its Motion for Preliminary Injunction and the relief requested herein.

Dated: July 3, 2025

Respectfully submitted,

/s/ Sean Berkowitz

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Attorneys for American Airlines, Inc.

CERTIFICATE OF SERVICE

I, Sean Berkowitz, an attorney, certify that on July 3, 2025, I caused a true and correct copy of the foregoing document to be electronically filed with the Clerk of Court using CM/ECF, which will serve on all counsel of record.

/s/ Sean Berkowitz
Sean Berkowitz